



Defence Infrastructure Organisation

Defence Infrastructure Organisation
Safeguarding Department
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Your Reference: TRA020002

Tel: [REDACTED]

Our Reference: 10040265

Email: [REDACTED]

Manston Airport Case Team
The Planning Inspectorate
Kite Wing
Temple Quay House
Temple Quay
Bristol
BS1 6PN

09 July 2021

By email only

Dear Sir/Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by RiverOak Strategic Partners Limited (“The Applicant”) for an Order granting Development Consent for the reopening and development of Manston Airport in Kent.

RESPONSE TO STATEMENT OF MATTERS

The Ministry of Defence (MOD) note the content of the statement of matters released by the Department of Transport and write to reiterate the current MOD position.

The MOD maintains its objection to the proposed development. Through previous submissions to the Examining Authority (ExA), it has been made clear that the development forming the subject of this scheme would have a significant and detrimental impact on the function and capability of an existing Safeguarded technical asset, specifically a High Resolution Direction Finder (HRDF), located on Manston airfield. This technical site is safeguarded in accordance with the process laid out in the Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002 (Circular 01/2003).

An HRDF consists of an antenna and associated equipment which, in conjunction with similar units in other locations, provide a navigational aid to aircraft operating within its range. At Manston Airfield this resource consists of an antenna and receiving equipment located to the north of the runway. The antenna is at the centre of a 120m radius area within which no buildings, structures or objects of any description should be permitted, no overhead metal cables or metal pipes should be installed, the height of vegetation should be limited to no more than 250mm in height and no vehicles, machinery or plant should be used unless

the consent of the responsible officer has been obtained. This 120m radius is required by the provisions of Joint Service Publication 604 (JSP 604) and in this case is also secured by a legal covenant. Outside the 120m radius circle there are further restrictions on the siting of buildings, structures, or solid objects to protect the function of this safeguarded asset.

As yet insufficient evidence (in the form of a proposed location, installation type, and technical specification) has been provided to demonstrate that the existing technical asset can be replaced. Further, the impacts of locating a replacement system in a less than optimum location could result in it providing less effective coverage compared to the existing system. This could affect the provision of air traffic services with implications to aviation safety. The approval of this development would appear contrary to the provisions of paragraph 95 of the National Planning Policy Framework (February 2019) which requires that planning decisions '*promote public safety and take into account wider security and defence requirements by*' '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*'

During the application process, the applicant has stated that a replacement HRDF can be provided that will ensure that the current service/capability will not be impaired. At this time however, no evidence has been submitted to demonstrate that this is the case. The developer has submitted a document entitled 'Phase 1A – Manston HRDF Relocation - Feasibility Study Report' which provides an initial, and cursory, inspection of possible HRDF replacement sites. The report concludes that the preferred site for the replacement HRDF would be on the proposed Air Traffic Control tower. This solution is not feasible as the erection of the new ATC tower would itself infringe the designated technical safeguarding area that ensures the function and capability of the existing HRDF system. Two other sites are also suggested, though it is not clear at this time whether the installation of an HRDF system at either of these sites would be feasible. No additional information or subsequent phases of this report have been submitted to ExA or provided to MOD and as such there is no evidence on which to vary our position or advice.

In order to ensure that the safeguarded technical asset benefits from suitable protection in the event that a Development Consent Order is issued, draft requirements were offered in the letter submitted 28 June 2019 and, following the Secretary of State's Request for Comments and Further Information dated 17 January 2020, further MOD comments were provided in a letter dated 31 January 2020. MOD would like to emphasise that unless sufficient evidence can be provided to demonstrate an appropriately sited HRDF system can be provided, that such a system can be delivered in a manner that would allow appropriate testing prior to acceptance, and that the siting and installation of the new system would offer no detriment to the function of the existing asset, it would not be possible for MOD to provide support for the discharge of the requested requirements.

Yours faithfully,

James Houghton
Senior Safeguarding Manager